

Internal Audit Report for Claydon & Whitton Parish Council for the period ending 31 March 2024

Clerk	Bethany Cutler
RFO (if different)	Daska Patel
Chairperson	Chris Studd
Precept	£38,360
Income	£180,801
Expenditure	£40,862
General reserves	£80,570.31
Earmarked reserves	£320,971.57
Audit type	Annual
Auditor name	Julie Lawes

Introduction

The primary objective of internal audit is to review, appraise and report upon the adequacy of internal control systems operating throughout the council. To achieve this SALC adopt a predominantly systems-based approach to audit.

The council's internal control system comprises the whole network of systems established within the council to provide reasonable assurance that the council's objectives will be achieved, with reference to:

- the effectiveness of operations
- the economic and efficient use of resources
- compliance with applicable policies, procedures, laws, and regulations
- the safeguarding of assets and interests from losses of all kinds, including those arising from fraud, irregularity, and corruption



• the integrity and reliability of information, accounts, and data

Methodology

When conducting the audit, the internal auditor may:

- conduct a selective assessment of compliance with relevant procedures and controls expected to be in operation during the financial year in order to be able to complete the Annual Internal Audit Report 2023/24 of the Annual Governance and Accountability Return (AGAR)
- review the reliability and integrity of financial information and the means used to identify, measure, classify and report such information
- review the means of safeguarding assets and, as appropriate, verify the existence of such assets
- appraise the economy and efficiency with which resources are employed, identify opportunities to improve performance and recommend solutions to problems
- review the established systems to ensure compliance with those policies, procedures, laws, and regulations which could have a significant impact on operations, and determine whether the council complies
- review the operations and activities to ascertain whether results are consistent with objectives and whether they are being conducted as planned

Section 1 - proper bookkeeping

The internal auditor will look at the methods and processes used to manage the council's accounts and in particular that it provides clear data for reporting and monitoring purposes. This includes checking information is accurate, kept up to date, referenced and verified.

	Internal auditor commentary		
YES	The council uses a computerised spreadsheet to form the basis of its accounts. All transactions are well referenced and provide an effective tool for the basis of the council's internal controls.		
YES	Accounts are conducted on a receipts and payments basis.		
YES	This provides good evidence to support the council's underlying statements.		
YES	A number of spot checks were carried out and the functionality of the cashbook was found to be in order.		
	YES		



Section 2 – Financial Regulation and Standing Orders

The internal auditor will check the date the Council conducted its annual review of both Standing Orders and Financial Regulations and in particular check if these are based on NALC'S latest model which include legislative changes.

Evidence		Internal auditor commentary
Have Standing Orders been adopted, up to date and reviewed annually?	YES	The Standing Orders, as seen on the Parish Council's website, were reviewed by council at a meeting held 10 th July 2023. Council's Standing Orders, are based on the latest model published by the National Association of Local Councils (2018) and contain the provisions of the Model Councillor Code of Conduct as adopted by the Council. The Standing Orders are compliant with legislation and have been adapted (where they are not statutory requirements) to ensure that they are relevant to the Parish Council. COMMENT: At the time of review council had not yet updated the Procurement Thresholds amendments (SI 2022/139) of the Public Contracts (Amendment) Regulations 2022 which came into force on 21 st December 2022 and make the changes to the contract value limits from £25,000 to £30,000 for non-central government authorities. The contract value limits are to be calculated inclusive of VAT (effective from 1 st January 2022).
Are Financial Regulations up to date and reviewed annually?	NO	Financial Regulations, as seen on the Council's website had not been updated since 11 th April 2022. COMMENT: It was noted within the council Risk Assessment document that the Financial Regulations had not been recently reviewed due to upcoming changes. RECOMMENDATION: NALC has now released revised Financial Regulations for 2024 which council should look to adopt at its earliest opportunity.
Has the Council properly tailored the Financial Regulations?	YES	The Council's Financial Regulations have been tailored to the Parish Council.

Last reviewed: 24th April 2024



Additional comments:		authority.	_
Has the Council appointed a Responsible Financial Officer (RFO)? ¹	YES	In accordance with Section 151 of the Local Government Act 1972(d) (financial administration), the Council has appointed a person to be responsible for the administration of the financial affairs of the relevant	

¹ Section 151 Local Government Act 1972 (d)



Section 3 - Payment controls

The internal auditor will specifically check bank reconciliation including credit/debit cards and management approval processes and evidence that internal Financial Regulations (FO) are being followed. The internal auditor will examine how regular payments are managed and specifically seek evidence that these have been brought back to the Council for verification purposes especially where the actual payment made differs from the amount previously agreed. VAT should be clearly identified including evidence that claims have been correctly managed. The internal auditor will check if the Council has a clear understanding on eligibility in relation to the General Power of Competence and that s.137 has been correctly applied and managed.

Evidence		Internal auditor commentary
Is there supporting paperwork for payments with appropriate authorisation?	YES	A selection of random payments were cross checked against the cash book, bank statement and invoices and all were found to be authorised in accordance with Proper Practices.
Where applicable, are internet banking transactions properly recorded and approved?	YES	Internet banking is operated in accordance with the Council's own Financial Regulations and is used for the settlement of the Council's expenditure. Evidence was provided detailing dual authorisation of payments.
Is VAT correctly identified, recorded, and claimed within time limits?	YES	VAT was received in two payments equalling a total of £8,208.09 as evidenced on the bank statements. £5,979.80 received 5 th June 2023 £2,228.29 received 20 th February 2024
Has the Council adopted the General Power of Competence (GPOC) and is there evidence this is being applied correctly? ²	N/A	Council has not adopted the General Power of Competence.
Are payments under s.137³ separately recorded, minuted and is there evidence of direct benefit to electorate?	YES	Council recorded donations totalling £1,200 in its cashbook.

² Localism Act

³ Section 137 of the Local Government Act 1972 ("the 1972 Act") enables local councils to spend a limited amount of money for purposes for which they have no other specific statutory expenditure. The basic power is for a local council to spend money (subject to the statutory limit – of £9.93 per elector) on purposes for the direct benefit of its area, or part of its area, or all or some of its inhabitants.

Last reviewed: 24th April 2024



Where applicable, are payments of interest and	N/A	Council has no loans
principal sums in respect of loans paid in accordance		
with agreements?		
Additional comments:		

Section 4 – Risk management

The internal auditor will expect to find evidence of the management of risks from identification of what those are for each individual Council through to how these will be managed and the controls in place to mitigate these and that these have been approved by the Council.

Evidence		Internal auditor commentary
Is there evidence of risk assessment documentation?	Partly Met	Council reviewed its Risk Assessment as recorded at its meeting held 3 rd June 2024. The document details in general terms the risks associated with the functioning of a smaller authority and the measures that the Council will undertake to mitigate such risks. COMMENT: Council did not review its risks within the period under review.
Is there evidence that risks are being identified and managed?	YES	Council has evidenced that is has taken steps to identify and manage financial risks.
Does the Council have appropriate and adequate insurance cover in place for employment, public liability and fidelity guarantee and has been reviewed on an annual basis?	YES	Council has insurance in place under a long-term specialist policy for local councils with Hiscox Insurance which shows core cover for the following: Public/Products Liability £10m; Employers Liability £10m and Fidelity Guarantee of £500k. RECOMMENDATION: Although under a long-term agreement, council should ensure annual reviews of its cover.



Evidence that internal controls are documented and regularly reviewed ⁴	NO	Council advised that a review of internal controls was not required during this period, however it is noted that this was also highlighted in the 2021/2022 and 2022/2023 Internal Audit Report as not completed. The council is unable to confirm that the financial and management systems of the council were sound and adequate and internal control arrangements were efficient and effective to address the risks associated with the management of public finances. RECOMMENDATION: As noted in the previous internal audit reviews, council should take the earliest opportunity to note the requirement, under the Accounts and Audit Regulations 2015, to have in place safe and efficient arrangements to safeguard public money. The adoption of an Internal Control Statement (model templates are available from SALC) would provide the basis for such an assertion and should be used to inform the council's preparation of its annual governance statement and should cover the dual authorisation system to be used with internet banking.
Evidence that a review of the effectiveness of internal audit was conducted during the year, including consideration of the independence and competence of the internal auditor prior to their appointment ⁵	NO	Council has not reviewed the scope and effectiveness of its internal audit arrangements.

Section 5 – Budgetary controls

The internal auditor will seek verification that budgets are properly prepared, agreed and monitored. In particular they will look for evidence of good practice in that the key stages of the budgetary process have been followed

Evidence	Internal auditor commentary

⁴ Accounts and Audit Regulations

⁵ Practitioners Guide

Last reviewed: 24th April 2024



Verify that budget has been properly prepared and agreed	YES	The budget for the year 2023/2024 was approved at the Council meeting of 23 rd January 2023 when setting the precept. RECOMMENDATION: For transparency council should look to record the budget set within its minutes.
Verify that the precept amount has been agreed in full Council and clearly minuted	YES	The precept was set at £38,360 for 2023/2024, as confirmed at the above meeting. RECOMMENDATION: For transparency council should look to record the precept amount, and the impact this will have on the council tax payer within its minutes.
Regular reporting of expenditure and variances from budget	YES	Council notes regular reviews of the budget against expenditure and income.
Reserves held – general and earmarked ⁶	YES	The Council, as at year-end, had general reserves of £80,570.31 and earmarked reserves of £295,614.15 covering £295,614.15 CIL funds and £25,357.42 car park funds.
Additional comments:	•	

⁶ In accordance with proper practices, the generally accepted minimum level of a Smaller Authority's General Reserve is that this should be maintained at between three (3) and twelve (12) months of Net Revenue Expenditure



Section 6 - income controls

The internal auditor will seek evidence to ensure income is correct managed – recorded, banked, and reported and test mechanisms used to achieve this.

Evidence		Internal auditor commentary
Is income properly recorded and promptly banked?	YES	Income is recorded in accordance with Council's Financial Regulations.
Is income reported to full council?	YES	In accordance with the Council's Standing Orders, income received is reported to full Council.
Does the precept recorded agree to the Council Tax Authority's notification?	YES	Council received precept in the sum of £38,360 from Mid-Suffolk District Council. Evidence was provided showing a full audit trail from Precept being discussed and approved to being served on the Charging Authority to remittance advice showing the Precept to be paid and receipt of same in the Council's Bank Account.
If appropriate, are CIL reporting schedules in accordance with the Regulations? ⁷	YES	Council CIL funds form part of the earmarked reserves, with the annual reports being published on the council website.
Is CIL income reported to the council?	YES	At the time of audit the 2023/2024 report was yet to be published. Council recorded the following:
Does unspent CIL income form part of earmarked reserves?	YES	£169,813.10 Starting Balance £125,801.05 Income
Has an annual report been produced?	NO	£0.00 Expenditure £295,614.15 End Balance

⁷ Community Infrastructure Levy Regulations 2010

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Has it been published on the authority's website?	NO	
Additional comments:		



Section 7 - petty cash

The Internal Auditor will seek evidence that the Council has followed its own policies, procedures, and verification processes and that these are up to date.

	Internal auditor commentary
N/A	Council does not operate a petty cash system.
N/A	

Additional comments:



Section 8 - Payroll controls

The Internal Auditor will check salaries were approved in accordance with PAYE, NI, Pension and that there is a clear understanding that the clerk is not self-employed. The Internal Auditor will also review how payroll is managed including evidence of approval of payslips.

Evidence		Internal auditor commentary
Do all employees have contracts of employment?	YES	Council had 2 employees on its payroll at the period end of 31 st March 2024. Employment contracts were not reviewed during the internal audit but the Clerk to the Council has confirmed that a Contract of Employment is in place.
Has the Council approved salary paid?	YES	All salary payments are presented to the Council for approval and payments made in accordance with Council's own Financial Regulations. No employee is paid the national minimum wage.
Minimum wage paid?	N/A	
Are arrangements in place for authorising of the payroll and payments to the council? Does this include a verification process for agreeing rates of pay to be applied?	YES	There are suitable payroll arrangements in place which ensures the accuracy and legitimacy of payments of salaries and wages, and associated liabilities and as such the council has complied with its duties under legislation.
Do salary payments include deductions for PAYE/NIC? Is PAYE/NIC paid promptly to HMRC?	YES	The payroll function for the year under review is operated in accordance with HM Revenue and Customs guidelines and outsourced to Suffolk Association of Local Councils. Cross-checks were completed on three payments covering salary and PAYE were found to be in order. Deductions paid to HM Revenue and Customs during the year under review were made in accordance with timescales as set out in the regulations.

Last reviewed: 24th April 2024



Is there evidence that the Council is aware of its pension responsibilities? Are pension payments in operation? ⁸	YES	Council is aware of its pension responsibilities with the internal audit for the year ending 31st March 2022 confirming that Council has complied with its duties as an employer with regards to automatic enrolment and has completed and submitted a re-declaration of compliance to the Pension Regulator (8th June 2022). Pension payments are made in accordance with timescales agreed with the Council's Pension Provider.
Have pension re-declaration duties been carried out	YES	As above
Are there any other payments (e.g.: expenses) and are these reasonable and approved by the Council?	YES	There is a satisfactory expense system in place and all staff expenses claimed are approved in accordance with Council's Financial Regulations.
Additional comments:	•	,

⁸ The Pension Regulator – <u>website click here</u>



Section 9 - Asset control

The Internal Audit will be seeking to establish if there is a list of assets in accordance with proper practices including the date of acquisition, location, and value. This extends to checking policies (with evidence of review) and that the Council has applied the documented approach in practice. The Internal Auditor will check not only valuation processes but the existence of reserve budgets for depreciation and adequacy of insurance. A clear audit trail should be available when items are purchased including minutes to evidence approval.

Evidence		Internal auditor commentary
Does the Council maintain a register of material assets it owns and manage this in accordance with proper practices? ⁹	YES	The Asset Register as published on the council website reflects those items listed under insurance and within the Parish Council's remit for maintenance and ownership. It is noted that the declared value for all assets at year-end is £53,757.
		No records of deeds, articles, land registry title number documents were viewed at the time of audit.
Is the value of the assets included? (Note value for insurance purposes may differ)	YES	
Are records of deeds, articles, land registry title number available?	N/A	
Are copies of licences or leases available for assets sited at third party property?	N/A	The council did not advise of any assets sited at third party locations with leases or licences.
Is the asset register up to date and reviewed annually?	YES	The Asset Register details annual reviews.
Cross checking of insurance cover	YES	Council has insurance under all risks cover for its assets as specified under generic headings on the insurance schedule.

⁹ Practitioners Guide

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Section 10 - bank reconciliation

The internal auditor will seek to establish that the Council understands and can evidence good practice and internal control mechanisms in relation to bank reconciliation.

Evidence		Internal auditor commentary
Is bank reconciliation regularly completed and reconciled with the cash book and cover every account?	YES	Bank reconciliations are completed on a regular basis and reconcile with the cash sheets.
Do bank balances agree with bank statements?	YES	Bank balances agree with period end statements and, as at year end 31st March 2024 the balance across the council's accounts stood at £401,541.88 as recorded in the Statement of Accounts and on the Yearend Bank Reconciliation.
Is there regular reporting of bank balances at Council meetings?	YES	Balances across the Council's accounts are regularly reported within the finance reports.



Section 11 – year end procedures

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Evidence		Internal auditor commentary
Are appropriate accounting procedures used?	YES	Accounts are produced on a receipts and payments basis and all found to be in order.
Financial trail from records to presented accounts	YES	There is a full audit trail from records to presented accounts.
Has the appropriate end of year AGAR ¹⁰ documents been completed?	YES	As Council is a smaller authority with gross income and expenditure exceeding £25,000 it has completed Form 3 of the AGAR. RECOMMENDATION: The AGAR recommends that council 'should' receive the Internal Report prior to signing off councils' statement and accounts.
Did the Council meet the exemption criteria and correctly declared itself exempt?	N/A	Council was not exempt from a limited assurance review.
During the period in question did the small authority demonstrate that it correctly provided for the exercise of public right as required by the Accounts and Audit Regulations 2015?	YES	During the review of the publication requirements of the Accounts and Audit Regulations 2015, it is noted that, for the year 2022-2023, the Council correctly provided for the exercise of elector's rights. The RFO had set the dates for the inspection of the Council's accounts and associated documents as 19th June 2023 to 28th July 2023 with the date of the notice being 15th June 2023.
Have the publication requirements been met in accordance with the Regulations? ¹¹	YES	The Council has complied with the requirements of the Regulations for smaller authorities with income and expenditure exceeding £25,000 and published the following on a public website: • Notice of the period for the exercise of public rights

¹⁰ Annual Governance & Accountability Return (AGAR)

¹¹ Accounts and Audit Regulations 2015

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	Section 1 - Annual Governance Statement 2022/23, Section 2 - Accounting Statements 2022/23 Notice of conclusion of audit Section 3 - External Auditor Report and Certificate Annual Internal Audit Report.
Additional comments:	



Section 12 - internal audit

The internal auditor will revisit weaknesses and recommendations previously identified to see if these have been addressed. They will also check if any changes introduced require further verification to ensure effectiveness of the corrective action taken.

Council gave consideration to the internal audit report at a Planning and Finance Council meeting held 12th June 2023
 Council is still to: Undertake annual Risk Assessments – it was reported by the RFO these have been produced and are to be approved July 2024 Conduct an annual review of its Internal Controls Give consideration to additional GDPR policies
Council appointed SALC as the auditors for 2023/2024 at a Planning and Finance meeting held 4 th March 2024.
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Section 13 – external audit for the period under review

The internal auditor will revisit the external audit so that previous weaknesses and recommendations can be considered.

Evidence		Internal auditor commentary
Has the Council considered the previous external audit report? ¹²	YES	Council gave consideration to the external report within its meeting of the Planning and Finance Council meeting held 4 th September 2023.
Has appropriate action been taken regarding the comments raised?	Partly Met	The External Auditor report detailed weaknesses in relation to the internal controls as highlighted by the Internal Auditor which have remained unfulfilled during the period under review and data protection.

¹² Regulation 20 Accounts and Audit Regulations 2015 – following completion of an audit the Council should note that it is the Council as a whole (i.e., All members) and not a committee that should receive and consider the audit letter (including Annual Return and Certificate) from the local auditor as soon as reasonably practicable and the minutes should reflect that these have been received.



Section 14 – additional information

The internal auditor will look for additional evidence of good record keeping, compliance with data protection regulations, freedom of information and website accessibility regulations.

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Evidence		Internal auditor commentary
Was the annual meeting held in accordance with legislation? 13	YES	Council held its Annual Meeting of the Parish Council at which the Chair and other Officers were elected on 15 th May 2023 in accordance with legislation.
Is there evidence that Minutes are administered in accordance with legislation? 14	YES	Council is aware that that under LGA 1972 schedule 12, paragraphs 41(1) and 44 the draft minutes of a meeting should be formally approved (with any necessary amendments) at the next meeting. At each meeting, the Chair is given formal approval to sign the minutes.
Is there a list of members' interests held?	YES	Evidence was seen on the District Council website for the Register of Interests for Parish Councillors with a direct link from the Parish Council website.
Does the Council have any Trustee responsibilities and if so, are these clearly identified in a Trust Document?	N/A	Council does not have any Trustee Responsibilities.
Has the Transparency Code been correctly applied, and information published in accordance with current legislation?	Partly Met	Council is reminded that councils with income over £25,000 but under £200,00 will be expected (but are not legally required to do so) to follow the Local Government Transparency Code 2015 (turnover exceeding £200,000).
Has the Council registered with the Information Commissioner's Office (ICO)? ¹⁵	YES	The Council is correctly registered with the Information Commissioner's Office (ICO) as a Data Controller in accordance with the Data Protection Legislation. Reference: ZA446640 Expiry: 07 th August 2024

¹³ The Local Government Act 1972 Schedule 12, paragraph 7 (2) and Schedule 15 (2)

¹⁴ Public Bodies (Admission to Meetings) Act 1960, Local Government Act 1972, and the Localism Act 2011

¹⁵ Data Protection Act 2018



Is the Council compliant with the General Data Protection Regulation requirements?	NO	Council has taken steps to work toward compliancy with the following published on its website: • Model Publication Scheme • Openness and Transparency Statement RECOMMENDATION: As advised within the previous two year's internal audit reports, Council should carry out a Data Protection Impact Assessment which will assess the personal data being held and will assist with the understanding of how this data is being processed. Council will then be in a position to adopt specific policies detailing the framework that the public can expect for the handling of requests from individuals who have the right to know what data is held on them, why the data is being processed and whether it will be given to any third party. Council should also consider the adoption of a Data Retention Policy which will detail the periods for which documentation will be held along with the methods of disposal.
Has the Council published a website accessibility statement on their website in line with Regulations? ¹⁶	YES	Council has accessibility tools on its website thereby allowing for the increased functionality of the council's website, along with a website accessibility statement detailing the technical information of the website along with the methods used for testing the website; the steps being taken to improve accessibility and how the site is being improved to ensure that content meets the WCAG 2.1 Standard under Regulation 8 of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.
Does the council have official email addresses for correspondence? ¹⁷	YES	The clerk to the council has an official email address for correspondence.
Is there evidence that electronic files are backed up?	YES	Council uses a system whereby a back-up of the council's data is taken and stored appropriately.

¹⁶ Website Accessibility Regulations 2018

¹⁷ Practitioners Guide

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Do terms of reference exist for all committees and is there evidence these are regularly reviewed?	N/A	Terms of references for committees were not viewed at the time of audit.
Additional comments:		

Signed: J. Lawes

Date of Internal Audit Visit: N/A

Date of Internal Audit Report: 9th July 2024

On behalf of Suffolk Association of Local Councils